

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY
NEWARK DIVISION**

JOANNE NEALE, KERI HAY, KELLY MCGARY, SVEIN A. BERG,
GREGORY P. BURNS, DAVID TAFT,
JEFFREY KRUGER and KAREN COLLOPY individually and on behalf of others similarly situated,

Plaintiffs,

vs.

VOLVO CARS OF NORTH AMERICA, LLC, and VOLVO CAR CORPORATION,

Defendants.

No. 2:10-cv-04407-DMC-MF

CLASS ACTION

JURY TRIAL DEMANDED

EXHIBIT A – CHART OF DOCUMENTS PLAINTIFFS’ SEEK TO HAVE SUBMITTED UNDER SEAL

Document 1	Plaintiff Svein Berg’s Memorandum of Law in Opposition to Defendants’ Motion for Summary Judgment
Disclosed to Public?	No. The parties agreed to keep this material confidential.
Subject to D.N.J. Confidentiality Order	Yes.
L.Civ.R. 5.3(C) factors	
(c)(2)(b) Public or Private Interests Protected	Protects the parties’ agreement to keep this material confidential.
(c)(2)(c) Clearly Defined Serious Injury	Disclosure would divulge confidential Volvo internal information.
(c)(2)(d) Unavailability of Less Restrictive Alternative	All aspects of this material are confidential.
Defendants’ Objection to Seal?	No.

Document 2	<p>Exhibits to the Certification of Matthew D. Schelkopf in Support of Plaintiff Berg's Opposition to Defendants' Motion for Summary Judgment</p> <ul style="list-style-type: none"> • Exhibits 10 and 11: Documents Produced And Bates Stamped By Defendants During Discovery • Exhibit 13: Deposition Exhibit Excerpts from the Deposition of Andy McCloskey, dated December 14, 2011
Disclosed to Public?	No. The parties agreed to keep this material confidential.
Subject to D.N.J. Confidentiality Order	Yes.
L.Civ.R. 5.3(C) factors	
(c)(2)(b) Public or Private Interests Protected	Protects the parties' agreement to keep this material confidential.
(c)(2)(c) Clearly Defined Serious Injury	Disclosure would divulge confidential Volvo internal information.
(c)(2)(d) Unavailability of Less Restrictive Alternative	All aspects of this material are confidential.
Defendants' Objection to Seal?	No.
Document 3	Plaintiff Svein Berg's Response and Statement of Undisputed Material Facts in Opposition to Volvo's Motion for Summary Judgment
Disclosed to Public?	No. The parties agreed to keep this material confidential.
Subject to D.N.J. Confidentiality Order	Yes.
L.Civ.R. 5.3(C) factors	
(c)(2)(b) Public or Private Interests Protected	Protects the parties' agreement to keep this material confidential.
(c)(2)(c) Clearly Defined Serious Injury	Disclosure would divulge confidential Volvo internal information.
(c)(2)(d) Unavailability of Less Restrictive Alternative	All aspects of this material are confidential.
Defendants' Objection to Seal?	No.
Document 4	Plaintiff Gregory Burns' Memorandum of Law in

	Opposition to Defendants' Motion for Summary Judgment
Disclosed to Public?	No. The parties agreed to keep this material confidential.
Subject to D.N.J. Confidentiality Order	Yes.
L.Civ.R. 5.3(C) factors	
(c)(2)(b) Public or Private Interests Protected	Protects the parties' agreement to keep this material confidential.
(c)(2)(c) Clearly Defined Serious Injury	Disclosure would divulge confidential Volvo internal information.
(c)(2)(d) Unavailability of Less Restrictive Alternative	All aspects of this material are confidential.
Defendants' Objection to Seal?	No.
Document 5	<p>Exhibits to the Certification of Matthew D. Schelkopf in Support of Plaintiff Burns' Opposition to Defendants' Motion for Summary Judgment</p> <ul style="list-style-type: none"> • Exhibits 9 and 10: Documents Produced And Bates Stamped By Defendants During Discovery • Exhibit 12: Deposition Exhibit Excerpts from the Deposition of Andy McCloskey, dated December 14, 2011
Disclosed to Public?	No. The parties agreed to keep this material confidential.
Subject to D.N.J. Confidentiality Order	Yes.
L.Civ.R. 5.3(C) factors	
(c)(2)(b) Public or Private Interests Protected	Protects the parties' agreement to keep this material confidential.
(c)(2)(c) Clearly Defined Serious Injury	Disclosure would divulge confidential Volvo internal information.
(c)(2)(d) Unavailability of Less Restrictive Alternative	All aspects of this material are confidential.
Defendants' Objection to Seal?	No.
Document 6	Plaintiff Gregory Burns' Response and Statement of Undisputed Material Facts in Opposition to Volvo's Motion for Summary Judgment

Disclosed to Public?	No. The parties agreed to keep this material confidential.
Subject to D.N.J. Confidentiality Order	Yes.
L.Civ.R. 5.3(C) factors	
(c)(2)(b) Public or Private Interests Protected	Protects the parties' agreement to keep this material confidential.
(c)(2)(c) Clearly Defined Serious Injury	Disclosure would divulge confidential Volvo internal information.
(c)(2)(d) Unavailability of Less Restrictive Alternative	All aspects of this material are confidential.
Defendants' Objection to Seal?	No.
Document 7	Plaintiff Karen Collopy's Memorandum of Law in Opposition to Defendants' Motion for Summary Judgment
Disclosed to Public?	No. The parties agreed to keep this material confidential.
Subject to D.N.J. Confidentiality Order	Yes.
L.Civ.R. 5.3(C) factors	
(c)(2)(b) Public or Private Interests Protected	Protects the parties' agreement to keep this material confidential.
(c)(2)(c) Clearly Defined Serious Injury	Disclosure would divulge confidential Volvo internal information.
(c)(2)(d) Unavailability of Less Restrictive Alternative	All aspects of this material are confidential.
Defendants' Objection to Seal?	No.
Document 8	<p>Exhibits to the Certification of Matthew D. Schelkopf in Support of Plaintiff Collopy's Opposition to Defendants' Motion for Summary Judgment</p> <ul style="list-style-type: none"> • Exhibits 8 and 9: Documents Produced And Bates Stamped By Defendants During Discovery • Exhibit 11: Deposition Exhibit Excerpts from the Deposition of Andy McCloskey, dated December 14, 2011
Disclosed to Public?	No. The parties agreed to keep this material confidential.
Subject to D.N.J.	Yes.

Confidentiality Order	
L.Civ.R. 5.3(C) factors	
(c)(2)(b) Public or Private Interests Protected	Protects the parties' agreement to keep this material confidential.
(c)(2)(c) Clearly Defined Serious Injury	Disclosure would divulge confidential Volvo internal information.
(c)(2)(d) Unavailability of Less Restrictive Alternative	All aspects of this material are confidential.
Defendants' Objection to Seal?	No.
Document 9	Plaintiff Karen Collopy's Response and Statement of Undisputed Material Facts in Opposition to Volvo's Motion for Summary Judgment
Disclosed to Public?	No. The parties agreed to keep this material confidential.
Subject to D.N.J. Confidentiality Order	Yes.
L.Civ.R. 5.3(C) factors	
(c)(2)(b) Public or Private Interests Protected	Protects the parties' agreement to keep this material confidential.
(c)(2)(c) Clearly Defined Serious Injury	Disclosure would divulge confidential Volvo internal information.
(c)(2)(d) Unavailability of Less Restrictive Alternative	All aspects of this material are confidential.
Defendants' Objection to Seal?	No.
Document 10	Plaintiff Keri Hay's Memorandum of Law in Opposition to Defendants' Motion for Summary Judgment
Disclosed to Public?	No. The parties agreed to keep this material confidential.
Subject to D.N.J. Confidentiality Order	Yes.
L.Civ.R. 5.3(C) factors	
(c)(2)(b) Public or Private Interests Protected	Protects the parties' agreement to keep this material confidential.
(c)(2)(c) Clearly Defined Serious Injury	Disclosure would divulge confidential Volvo internal information.
(c)(2)(d)	All aspects of this material are confidential.

Unavailability of Less Restrictive Alternative	
Defendants' Objection to Seal?	No.
Document 11	<p>Exhibits to the Certification of Matthew D. Schelkopf in Support of Plaintiff Hay's Opposition to Defendants' Motion for Summary Judgment</p> <ul style="list-style-type: none"> • Exhibits 9 and 10: Documents Produced And Bates Stamped By Defendants During Discovery • Exhibit 12: Deposition Exhibit Excerpts from the Deposition of Andy McCloskey, dated December 14, 2011
Disclosed to Public?	No. The parties agreed to keep this material confidential.
Subject to D.N.J. Confidentiality Order	Yes.
L.Civ.R. 5.3(C) factors	
(c)(2)(b) Public or Private Interests Protected	Protects the parties' agreement to keep this material confidential.
(c)(2)(c) Clearly Defined Serious Injury	Disclosure would divulge confidential Volvo internal information.
(c)(2)(d) Unavailability of Less Restrictive Alternative	All aspects of this material are confidential.
Defendants' Objection to Seal?	No.
Document 12	Plaintiff Keri Hay's Response and Statement of Undisputed Material Facts in Opposition to Volvo's Motion for Summary Judgment
Disclosed to Public?	No. The parties agreed to keep this material confidential.
Subject to D.N.J. Confidentiality Order	Yes.
L.Civ.R. 5.3(C) factors	
(c)(2)(b) Public or Private Interests Protected	Protects the parties' agreement to keep this material confidential.
(c)(2)(c) Clearly Defined Serious Injury	Disclosure would divulge confidential Volvo internal information.
(c)(2)(d) Unavailability	All aspects of this material are confidential.

of Less Restrictive Alternative	
Defendants' Objection to Seal?	No.
Document 13	Plaintiff Jeffrey Kruger's Memorandum of Law in Opposition to Defendants' Motion for Summary Judgment
Disclosed to Public?	No. The parties agreed to keep this material confidential.
Subject to D.N.J. Confidentiality Order	Yes.
L.Civ.R. 5.3(C) factors	
(c)(2)(b) Public or Private Interests Protected	Protects the parties' agreement to keep this material confidential.
(c)(2)(c) Clearly Defined Serious Injury	Disclosure would divulge confidential Volvo internal information.
(c)(2)(d) Unavailability of Less Restrictive Alternative	All aspects of this material are confidential.
Defendants' Objection to Seal?	No.
Document 14	Exhibits to the Certification of Matthew D. Schelkopf in Support of Plaintiff Kruger's Opposition to Defendants' Motion for Summary Judgment <ul style="list-style-type: none"> • Exhibits 9 and 10: Documents Produced And Bates Stamped By Defendants During Discovery
Disclosed to Public?	No. The parties agreed to keep this material confidential.
Subject to D.N.J. Confidentiality Order	Yes.
L.Civ.R. 5.3(C) factors	
(c)(2)(b) Public or Private Interests Protected	Protects the parties' agreement to keep this material confidential.
(c)(2)(c) Clearly Defined Serious Injury	Disclosure would divulge confidential Volvo internal information.
(c)(2)(d) Unavailability of Less Restrictive Alternative	All aspects of this material are confidential.
Defendants' Objection to Seal?	No.
Document 15	Plaintiff Jeffrey Kruger's Response and Statement of Undisputed Material Facts in Opposition to Volvo's

	Motion for Summary Judgment
Disclosed to Public?	No. The parties agreed to keep this material confidential.
Subject to D.N.J. Confidentiality Order	Yes.
L.Civ.R. 5.3(C) factors	
(c)(2)(b) Public or Private Interests Protected	Protects the parties' agreement to keep this material confidential.
(c)(2)(c) Clearly Defined Serious Injury	Disclosure would divulge confidential Volvo internal information.
(c)(2)(d) Unavailability of Less Restrictive Alternative	All aspects of this material are confidential.
Defendants' Objection to Seal?	No.
Document 16	Plaintiff Kelly McGary's Memorandum of Law in Opposition to Defendants' Motion for Summary Judgment
Disclosed to Public?	No. The parties agreed to keep this material confidential.
Subject to D.N.J. Confidentiality Order	Yes.
L.Civ.R. 5.3(C) factors	
(c)(2)(b) Public or Private Interests Protected	Protects the parties' agreement to keep this material confidential.
(c)(2)(c) Clearly Defined Serious Injury	Disclosure would divulge confidential Volvo internal information.
(c)(2)(d) Unavailability of Less Restrictive Alternative	All aspects of this material are confidential.
Defendants' Objection to Seal?	No.
Document 17	<p>Exhibits to the Certification of Matthew D. Schelkopf in Support of Plaintiff McGary's Opposition to Defendants' Motion for Summary Judgment</p> <ul style="list-style-type: none"> • Exhibits 10 and 11: Documents Produced And Bates Stamped By Defendants During Discovery • Exhibit 13: Deposition Exhibit Excerpts from the Deposition of Andy McCloskey, dated December 14, 2011
Disclosed to Public?	No. The parties agreed to keep this material confidential.

Subject to D.N.J. Confidentiality Order	Yes.
L.Civ.R. 5.3(C) factors	
(c)(2)(b) Public or Private Interests Protected	Protects the parties' agreement to keep this material confidential.
(c)(2)(c) Clearly Defined Serious Injury	Disclosure would divulge confidential Volvo internal information.
(c)(2)(d) Unavailability of Less Restrictive Alternative	All aspects of this material are confidential.
Defendants' Objection to Seal?	No.
Document 18	Plaintiff Kelly McGary's Response and Statement of Undisputed Material Facts in Opposition to Volvo's Motion for Summary Judgment
Disclosed to Public?	No. The parties agreed to keep this material confidential.
Subject to D.N.J. Confidentiality Order	Yes.
L.Civ.R. 5.3(C) factors	
(c)(2)(b) Public or Private Interests Protected	Protects the parties' agreement to keep this material confidential.
(c)(2)(c) Clearly Defined Serious Injury	Disclosure would divulge confidential Volvo internal information.
(c)(2)(d) Unavailability of Less Restrictive Alternative	All aspects of this material are confidential.
Defendants' Objection to Seal?	No.
Document 19	Plaintiff Joanne Neale's Memorandum of Law in Opposition to Defendants' Motion for Summary Judgment
Disclosed to Public?	No. The parties agreed to keep this material confidential.
Subject to D.N.J. Confidentiality Order	Yes.
L.Civ.R. 5.3(C) factors	
(c)(2)(b) Public or Private Interests Protected	Protects the parties' agreement to keep this material confidential.
(c)(2)(c) Clearly Defined Serious Injury	Disclosure would divulge confidential Volvo internal information.

(c)(2)(d) Unavailability of Less Restrictive Alternative	All aspects of this material are confidential.
Defendants' Objection to Seal?	No.
Document 20	<p>Exhibits to the Certification of Matthew D. Schelkopf in Support of Plaintiff Neale's Opposition to Defendants' Motion for Summary Judgment</p> <ul style="list-style-type: none"> • Exhibits 10 and 11: Documents Produced And Bates Stamped By Defendants During Discovery • Exhibit 13: Deposition Exhibit Excerpts from the Deposition of Andy McCloskey, dated December 14, 2011
Disclosed to Public?	No. The parties agreed to keep this material confidential.
Subject to D.N.J. Confidentiality Order	Yes.
L.Civ.R. 5.3(C) factors	
(c)(2)(b) Public or Private Interests Protected	Protects the parties' agreement to keep this material confidential.
(c)(2)(c) Clearly Defined Serious Injury	Disclosure would divulge confidential Volvo internal information.
(c)(2)(d) Unavailability of Less Restrictive Alternative	All aspects of this material are confidential.
Defendants' Objection to Seal?	No.
Document 21	Plaintiff Joanne Neale's Response and Statement of Undisputed Material Facts in Opposition to Volvo's Motion for Summary Judgment
Disclosed to Public?	No. The parties agreed to keep this material confidential.
Subject to D.N.J. Confidentiality Order	Yes.
L.Civ.R. 5.3(C) factors	
(c)(2)(b) Public or Private Interests Protected	Protects the parties' agreement to keep this material confidential.
(c)(2)(c) Clearly Defined Serious Injury	Disclosure would divulge confidential Volvo internal information.
(c)(2)(d)	All aspects of this material are confidential.

Unavailability of Less Restrictive Alternative	
Defendants' Objection to Seal?	No.
Document 22	Plaintiff David Taft's Memorandum of Law in Opposition to Defendants' Motion for Summary Judgment
Disclosed to Public?	No. The parties agreed to keep this material confidential.
Subject to D.N.J. Confidentiality Order	Yes.
L.Civ.R. 5.3(C) factors	
(c)(2)(b) Public or Private Interests Protected	Protects the parties' agreement to keep this material confidential.
(c)(2)(c) Clearly Defined Serious Injury	Disclosure would divulge confidential Volvo internal information.
(c)(2)(d) Unavailability of Less Restrictive Alternative	All aspects of this material are confidential.
Defendants' Objection to Seal?	No.
Document 23	<p>Exhibits to the Certification of Matthew D. Schelkopf in Support of Plaintiff Taft's Opposition to Defendants' Motion for Summary Judgment</p> <ul style="list-style-type: none"> • Exhibits 13 and 14: Documents Produced And Bates Stamped By Defendants During Discovery • Exhibit 17: Deposition Exhibit Excerpts from the Deposition of Andy McCloskey, dated December 14, 2011
Disclosed to Public?	No. The parties agreed to keep this material confidential.
Subject to D.N.J. Confidentiality Order	Yes.
L.Civ.R. 5.3(C) factors	
(c)(2)(b) Public or Private Interests Protected	Protects the parties' agreement to keep this material confidential.
(c)(2)(c) Clearly Defined Serious Injury	Disclosure would divulge confidential Volvo internal information.
(c)(2)(d) Unavailability of Less Restrictive Alternative	All aspects of this material are confidential.

Alternative	
Defendants' Objection to Seal?	No.
Document 24	Plaintiff David Taft's Response and Statement of Undisputed Material Facts in Opposition to Volvo's Motion for Summary Judgment
Disclosed to Public?	No. The parties agreed to keep this material confidential.
Subject to D.N.J. Confidentiality Order	Yes.
L.Civ.R. 5.3(C) factors	
(c)(2)(b) Public or Private Interests Protected	Protects the parties' agreement to keep this material confidential.
(c)(2)(c) Clearly Defined Serious Injury	Disclosure would divulge confidential Volvo internal information.
(c)(2)(d) Unavailability of Less Restrictive Alternative	All aspects of this material are confidential.
Defendants' Objection to Seal?	No.
Document 25	Certification of Charles E. Benedict, Ph.D., P.E. In Support of Plaintiffs' Motion for Class Certification.
Disclosed to Public?	No. The parties agreed to keep this material confidential.
Subject to D.N.J. Confidentiality Order	Yes.
L.Civ.R. 5.3(C) factors	
(c)(2)(b) Public or Private Interests Protected	Protects the parties' agreement to keep this material confidential.
(c)(2)(c) Clearly Defined Serious Injury	Disclosure would divulge confidential Volvo internal information.
(c)(2)(d) Unavailability of Less Restrictive Alternative	All aspects of this material are confidential.
Defendants' Objection to Seal?	No.

Dated: August 24, 2012

Respectfully submitted,

By: //s// Matthew D. Schelkopf
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